

# EXHIBIT E



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March 31, 2014

VIA EMAIL

Kent A. Yalowitz, Esq.  
Arnold & Porter LLP  
399 Park Avenue  
New York, NY 10022-4690

Re: *Sokolow v. Palestine Liberation Organization*, No. 04-CV-397(GBD) (RLE)

Dear Kent:

I write in response to your letter dated March 21, 2014, seeking a stipulation that 168 trial exhibits are authentic and admissible.

On the issue of authenticity, we do not dispute that we disclosed to Plaintiffs accurate copies of the actual documents in one of our clients' custody. We do not stipulate to the documents' authenticity, however. In your trial exhibit list, you do not provide a description of each document that you are seeking to introduce. Instead, you merely list the bates numbers of each document. Because Plaintiffs have not even stated what they believe each document purports to be, Defendants are in no position to stipulate to the documents' authenticity. Moreover, some of the documents appear on their face to have been created by third parties.

On the issue of foundation/hearsay, we do not believe that Plaintiffs are able to lay an appropriate foundation for the documents' admission under any hearsay exception or exclusion, or that Plaintiffs have shown that they fit within any hearsay exception or exclusion, including records of a regularly conducted activity (Rule 803(6)), public records (Rule 803(8)), statements of a party opponent (Rule 801(d)(2)), and the residual hearsay exception (Rule 807). Accordingly, we do not stipulate that any of the documents are admissible.

Sincerely,

A handwritten signature in dark ink, appearing to read "B. Hill".

Brian A. Hill